

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DANIEL PLAUT, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

THE GOLDMAN SACHS GROUP,
INC., LLOYD C. BLANKFEIN,
HARVEY M. SCHWARTZ, and R.
MARTIN CHAVEZ,

Defendants.

Civ. A. No. 1:18-cv-12084-VSB

**NOTICE OF MOVANT IWA FOREST INDUSTRY PENSION PLAN'S NON-
OPPOSITION TO COMPETING MOTIONS FOR LEAD PLAINTIFF**

On February 19, 2019, pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(a)(3)(B), IWA Forest Industry Pension Plan moved for appointment as lead plaintiff in connection with the above-captioned securities fraud class action. ECF No. 18. A number of putative class members also moved for appointment as lead plaintiff. ECF Nos. 15, 21, 25, 29.

The PSLRA provides that there is a presumption that "the most adequate plaintiff . . . is the person or group of persons" that, inter alia, "has the largest financial interest in the relief sought by the class." 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I). Having reviewed the competing motions and memoranda in support, it appears that IWA Forest Industry Pension Plan does not possess the largest financial interest in the relief sought by the class. Therefore, IWA Forest Industry Pension Plan does not oppose the competing motions for appointment as lead plaintiff made by putative class members with a larger financial interest than IWA Forest Industry Pension Plan in the relief sought by the class.

Should the Court determine the other lead plaintiff movants with larger losses than IWA Forest Industry Pension Plan are incapable of representing the class or inadequate to represent the class in this litigation, IWA Forest Industry Pension Plan continues to be willing and able to serve as lead plaintiff, or as a class representative should the Court deem such designation appropriate and just under all of the circumstances. This response is without prejudice to IWA Forest Industry Pension Plan's rights as a member of the proposed class, including, but not limited to, the right to share in any recovery from the resolution of this litigation through settlement, judgment or otherwise.

Dated: March 5, 2019

Respectfully submitted,

/s/ Frederic S. Fox

Frederic S. Fox

Donald R. Hall

Jeffrey P. Campisi

Pamela A. Mayer

KAPLAN FOX & KILSHEIMER LLP

850 Third Avenue, 14th Floor

New York, NY 10022

Telephone: (212) 687-1980

Facsimile: (212) 687-7714

*Attorneys for Movant IWA Forest Industry
Pension Plan*

CERTIFICATE OF SERVICE

I, Frederic S. Fox, hereby certify that, on March 5, 2019, I caused the foregoing to be served on all counsel of record by filing the same with the Court using the CM\ECF system which will send electronic notices of the filing to all counsel of record.

/s/ Frederic S. Fox

Frederic S. Fox